

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA
V.
MICHAEL DAVID CARROLL

CASE NO. 3:13-CR-076-N

MOTION FOR DETENTION

The United States moves for pretrial detention of defendant, **Michael David Carroll**, pursuant to 18 U.S.C. §3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

- Crime of violence (18 U.S.C. §3156);
 Maximum sentence life imprisonment or death
 10 + year drug offense
 Felony, with two prior convictions in above categories
 Serious risk defendant will flee
 Serious risk obstruction of justice
 Felony involving a minor victim
 Felony involving a firearm, destructive device, or any other dangerous weapon
 Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

Defendant's appearance as required

Safety of any other person and the community

3. Rebuttable Presumption. The United States will/will not invoke the rebuttable presumption against defendant because (check one or both):

Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. §924(c)

Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. §2332b(g)(5)

Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§1201, 2251

Previous conviction for "eligible" offense committed while on pretrial bond

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

At first appearance

After continuance of 3 days.

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DATED this 2nd day of June, 2021.

Respectfully submitted,

PRERAK SHAH
ACTING UNITED STATES ATTORNEY

s/ David L. Jarvis

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CERTIFICATE OF SERVICE

I hereby certify on June 2, 2021, that a copy of the foregoing will be served via ECF electronic notice on counsel for the defendant, in accordance with the Federal Rules of Criminal Procedure, whenever a defense counsel files a formal Notice of Appearance in this case.

s/ David L. Jarvis

DAVID L. JARVIS
Assistant United States Attorney